

COMMONWEALTH OF KENTUCKY

BEFORE THE KENTUCKY PUBLIC SERVICE COMMISSION

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In the Matter of:

PETITION OF NPCR, INC.)
D/B/A NEXTEL PARTNERS)
FOR DESIGNATION AS)
AN ELIGIBLE TELECOMMUNICATIONS CARRIER)
IN THE COMMONWEALTH OF KENTUCKY)

CASE NO. 2003-00143

**MOTION TO EXTEND THE TIME
TO RESPOND TO INFORMATION REQUESTS**

Comes the Petitioner, NPCR, Inc., d/b/a Nextel Partners, by counsel, and for its Motion to Extend the Time to Repsond to Information Requests, states as follows:

1. By Order dated August 13, 2003, the Commission set an August 29, 2003 deadline for Intervenors to submit information requests to Petitioner in the within case, and further set a September 12, 2003 deadline for Petitioner to respond to said requests.
2. Intervenors filed informational requests with the Commission on August 29, 2003.
3. Through inadvertence, Intervenor's informational requests were not mailed to counsel for Petitioner until September 2, 2003, and were not received by counsel for Petitioner until September 4, 2003.
4. Petitioner, in consideration of the effective reduction in time to prepare responses to Intervenors' informational requests, requests that the deadline for Petitioner to respond to the informational requests be extended by four (4) days from September 12, 2003 to September 26, 2003, to provide sufficient time to properly

respond in light of Intervenor's inadvertent four (4) day delay in mailing the informational requests.

5. A copy of the envelope bearing a postmark of September 2, 2003, which envelope contained the service copy of the informational requests received by the undersigned counsel for Petitioner, is attached as **Exhibit A** to this Motion.


6. Upon information and belief, counsel for Intervenor has no objection to the granting of the requested extension.

WHEREFORE, Applicant, by counsel, moves the PSC to amend its Order in the within case dated August 13, 2003, to prescribe an extension of the time for Applicant to respond to the informational requests received from Intervenor's.

Respectfully submitted,

NPCR, INC. d/b/a NEXTEL PARTNERS

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CERTIFICATE OF SERVICE

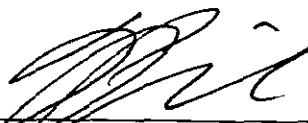
I, David A. Pike, an attorney with the law firm of Pike Legal Group, PLLC, hereby certify that on this the 9th day of September, 2003, I caused a true and complete copy of the foregoing Motion to be sent via U.S. Mail, postage-prepaid, to the following:

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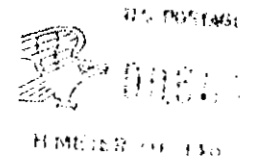
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EXHIBIT A